

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHICAGOANS FOR AN END TO THE )  
GANG DATABASE: BLACK YOUTH )  
PROJECT 100 CHICAGO, BLOCKS )  
TOGETHER, BRIGHTON PARK )  
NEIGHBORHOOD COUNCIL, LATINO )  
UNION, MIJENTE, and ORGANIZED )  
COMMUNITIES AGAINST DEPORTATION, )  
as well as DONTA LUCAS, JONATHAN )  
WARNER, LESTER COOPER, and LUIS )  
PEDROTE-SALINAS, on behalf of themselves )  
and a class of similarly situated persons, )

Plaintiffs, )

v. )

CITY OF CHICAGO, SUPERINTENDENT )  
EDDIE JOHNSON, and CHICAGO POLICE )  
OFFICERS MICHAEL TOMASO (#6404), )  
MICHAEL GOLDEN (#15478), PETER )  
TOLEDO (#2105), JOHN DOES 1-4, and )  
JANE DOES 1-2, )

Defendants. )

Case No.18cv4242  
(Class Action)  
Hon. Andrea Wood

**DECLARATION OF SHEILA A. BEDI**

I, Sheila Bedi, counsel for the Plaintiffs in the above captioned case, state that the following is true and correct to the best of my knowledge:

1. I am an attorney and clinical professor at the Roderick and Solange MacArthur Justice Center at Northwestern Pritzker School of Law in Chicago, Illinois. I submit this declaration in support of the Plaintiffs' Motion for Class Certification dated June 19, 2018.
2. Prior to joining the MacArthur Justice Center in September 2012, I served as the deputy legal director of the Southern Poverty Law Center in New Orleans where I represented people who are imprisoned in federal class action litigation challenging abusive prison conditions and worked on policy campaigns aimed at reducing incarceration rates and reforming criminal and juvenile justice systems. I have participated as counsel in numerous

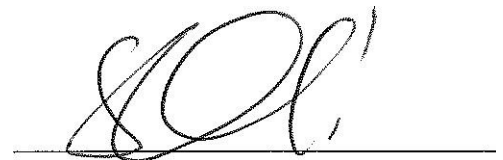
class action lawsuits involving the rights of people involved with justice systems including : *Troupe v. Barbour*, No. 3:10-cv-153 HTW-LRA (S.D. Miss) (class action on behalf of children with mental health needs who were unlawfully institutionalized or otherwise denied Medicaid services); *E.W. v. Lauderdale County*, No. 4:09-cv-137 TSL-LRA (class action on behalf of children detained in the Lauderdale County Juvenile Detention Center); *D.W. v. Harrison County*, No. 1:09-cv-267 LG-RHN (S.D. Miss.) (class action on behalf of children detained in the Harrison County Juvenile Detention Center); *J.A. v. Barbour*, No. 3:07-cv-00394, (S.D. Miss) (class action on behalf of children incarcerated at the Columbia Training School); *K.L.W. v. James*, No. 04-CV-149, (S.D. Miss.) (class action on behalf of children incarcerated at the Columbia Training School); *Morgan v. Sproat*, 432 F. Supp. 1130 (S.D. Miss. 1977) (monitoring State of Mississippi's compliance with judgment in conditions case on behalf of a class of incarcerated youth at Oakley Training School); and *Baker v. Campbell*, No. CV-03-1114-M (N.D. Ala.) (class action on behalf of chronically ill prisoners at Alabama correctional facility).

3. Since 2012, I have worked on a number of class actions involving the rights of justice-involved people in the Chicago area including *King v. Walker*, No. 06cv204 (N.D. Ill), *M.H. v. Monreal et al.*, No. 12cv8523 (N.D. Ill.), *Morales v. Monreal*, No. 13CV7572 (N.D. Ill) (class actions on behalf of parolees from Cook County) and *Campbell v. City of Chicago*. No. 17-cv-4467 (N.D. Ill (class action on behalf of people subjected to excessive force by the Chicago Police Department.)
4. I have also litigated two cases directly related to the Chicago Police Department's Gang Database (the subject matter of the instant litigation) *Catalan Ramirez v. Wong*, No. 17-cv-3258 (N.D. Ill) and *Pedrote-Salinas v. Johnson*, No. 17cv5093 (N.D. Ill).

5. Plaintiffs' counsel have worked for many months in identifying and investigating the claims in the action, through interviews with the named Plaintiffs, with scores of other putative class members and with other potential fact witnesses, consultation with potential experts, , and other extensive factual and legal research.
6. Plaintiffs' litigation team includes several highly experienced lawyers who have dedicated and will continue to commit major staffing and material resources to the representation of this class
7. Plaintiffs' counsel have built a strong, effective working relationship with the named and organizational Plaintiffs.
8. Counsel are prepared to retain highly qualified experts and to undertake the other necessary litigation expenses on behalf of the Plaintiffs and the proposed class
9. I am a member in good standing of the bar of the State of Illinois.
10. The Roderick and Solange MacArthur Justice Center has sufficient funds to finance the costs of this litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2018 in Chicago, Illinois.

A handwritten signature in black ink, appearing to read 'Sheila Bedi', is written over a horizontal line.

Sheila Bedi